

Given the labor shortage of qualified interpreters, VRS cannot be mandatory at this time.

Given the possible increase in repetitive motion injuries among interpreters who do VRS work, all centers should be staffed with a team approach (i.e. 2 interpreters per station or an equivalent set-up).

I would strongly suggest the FCC reconsider the 10 minute rule. Forcing an interpreter to stay on a call for 10 minutes while not understanding the client is a disservice to both the caller and the interpreter.

Interpreters can do a much more professional job when given the opportunity to know a bit about what will happen during a phone call. The call will be processed more smoothly. Therefore, CA's should be allowed to ask for important names and concepts. The Deaf consumers can choose to divulge helpful information or not with a clear understanding that the call may be more or less smooth as a result of their choice.

Because sign language interpreting is fast enough to keep up with the average speaking rate, the strength of video relay is that it is fast. A reimbursement rate based on a per-minute compensation amount distributed from NECA to providers is penalizing video relay for its strength.

Regarding harassment of CA's--in other work settings, employers are legally required to provide training and mechanisms for documenting incidents and reporting methods. Disciplinary action may be taken against another employee who is initiating the abuse. What liability will VRS providers incur if the FCC does not allow VRS CAs to terminate calls or remove themselves from calls where they are being abused?

As for the speed of answer rule, the waiver should continue. If any rule is enacted, it should be longer than the 10/85 rule. Anything else automatically penalizes the more successful companies for having more customers.

Given the fact that interpreters are members of the larger Deaf-World, it is entirely possible that an interpreter and a Deaf consumer may want to "chat" during "idle time." I don't think this should be forbidden or mandated. Rather, this should be an individual choice made by the consumer and the interpreter in that moment. As always, the consumer should be the one who initiates any type of casual conversation.